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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA
**[PROPOSED] ORDER GRANTING
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL WAYMO'S OFFER OF
PROOF REGARDING DEFENDANTS'
DISCOVERY MISCONDUCT**

1 Plaintiff Waymo LLC (“Waymo”) has filed an Administrative Motion to File Under Seal
 2 (“Waymo’s Administrative Motion”) certain information in its Offer of Proof Regarding
 3 Defendant’s Discovery Misconduct (“Offer of Proof”).

4 Having considered Waymo’s Administrative Motion, and good cause to seal having been
 5 shown, the Court **GRANTS** Waymo’s Administrative Motion and **ORDERS** sealed the
 6 documents listed below:

Document	Portions to Be Filed Under Seal
Waymo’s Offer of Proof	Highlighted in blue Highlighted in green
Exhibit 1 to Nardinelli Declaration	Entire document
Exhibit 2 to Nardinelli Declaration	Entire document
Exhibit 3 to Nardinelli Declaration	Entire document
Exhibit 4 to Nardinelli Declaration	Entire document
Exhibit 5 to Nardinelli Declaration	Entire document
Exhibit 6 to Nardinelli Declaration	Entire document
Exhibit 7 to Nardinelli Declaration	Entire document
Exhibit 8 to Nardinelli Declaration	Entire document
Exhibit 9 to Nardinelli Declaration	Entire document
Exhibit 10 to Nardinelli Declaration	Entire document
Exhibit 12 to Nardinelli Declaration	Entire document
Exhibit 13 to Nardinelli Declaration	Entire document
Exhibit 14 to Nardinelli Declaration	Entire document
Exhibit 15 to Nardinelli Declaration	Entire document
Exhibit 16 to Nardinelli Declaration	Entire document
Exhibit 17 to Nardinelli Declaration	Entire document
Exhibit 18 to Nardinelli Declaration	Entire document
Exhibit 19 to Nardinelli Declaration	Entire document
Exhibit 20 to Nardinelli Declaration	Entire document
Exhibit 21 to Nardinelli Declaration	Entire document
Exhibit 22 to Nardinelli Declaration	Entire document
Exhibit 23 to Nardinelli Declaration	Entire document
Exhibit 24 to Nardinelli Declaration	Entire document
Exhibit 27 to Nardinelli Declaration	Entire document
Exhibit 32 to Nardinelli Declaration	Entire document
Exhibit 33 to Nardinelli Declaration	Entire document
Exhibit 34 to Nardinelli Declaration	Entire document
Exhibit 35 to Nardinelli Declaration	Entire document
Exhibit 36 to Nardinelli Declaration	Entire document
Exhibit 37 to Nardinelli Declaration	Entire document
Exhibit 38 to Nardinelli Declaration	Entire document
Exhibit 40 to Nardinelli Declaration	Entire document

1	Exhibit 41 to Nardinelli Declaration	Entire document
2	Exhibit 42 to Nardinelli Declaration	Entire document
3	Exhibit 43 to Nardinelli Declaration	Entire document
4	Exhibit 44 to Nardinelli Declaration	Entire document
5	Exhibit 45 to Nardinelli Declaration	Entire document
6	Exhibit 48 to Nardinelli Declaration	Entire document
7	Exhibit 49 to Nardinelli Declaration	Entire document
8	Exhibit 50 to Nardinelli Declaration	Entire document
9	Exhibit 51 to Nardinelli Declaration	Entire document
10	Exhibit 52 to Nardinelli Declaration	Entire document
11	Exhibit 53 to Nardinelli Declaration	Entire document
12	Exhibit 54 to Nardinelli Declaration	Entire document
13	Exhibit 60 to Nardinelli Declaration	Entire document
14	Exhibit 61 to Nardinelli Declaration	Entire document
15	Exhibit 62 to Nardinelli Declaration	Entire document
16	Exhibit 63 to Nardinelli Declaration	Entire document
17	Exhibit 64 to Nardinelli Declaration	Entire document
18	Exhibit 65 to Nardinelli Declaration	Entire document
19	Exhibit 66 to Nardinelli Declaration	Entire document
20	Exhibit 67 to Nardinelli Declaration	Entire document
21	Exhibit 68 to Nardinelli Declaration	Entire document
22	Exhibit 69 to Nardinelli Declaration	Entire document
23	Exhibit 70 to Nardinelli Declaration	Entire document
24	Exhibit 71 to Nardinelli Declaration	Entire document
25	Exhibit 72 to Nardinelli Declaration	Entire document
26	Exhibit 73 to Nardinelli Declaration	Entire document
27	Exhibit 75 to Nardinelli Declaration	Entire document
28	Exhibit 76 to Nardinelli Declaration	Entire document
	Exhibit 77 to Nardinelli Declaration	Entire document
	Exhibit 78 to Nardinelli Declaration	Entire document
	Exhibit 83 to Nardinelli Declaration	Entire document
	Exhibit 84 to Nardinelli Declaration	Entire document
	Exhibit 85 to Nardinelli Declaration	Entire document
	Exhibit 86 to Nardinelli Declaration	Entire document
	Exhibit 87 to Nardinelli Declaration	Entire document
	Exhibit 88 to Nardinelli Declaration	Entire document
	Exhibit 90 to Nardinelli Declaration	Entire document
	Exhibit 93 to Nardinelli Declaration	Entire document
	Exhibit 94 to Nardinelli Declaration	Entire document
	Exhibit 95 to Nardinelli Declaration	Entire document
	Exhibit 96 to Nardinelli Declaration	Entire document
	Exhibit 97 to Nardinelli Declaration	Entire document
	Exhibit 99 to Nardinelli Declaration	Entire document
	Exhibit 100 to Nardinelli Declaration	Entire document
	Exhibit 101 to Nardinelli Declaration	Entire document
	Exhibit 102 to Nardinelli Declaration	Entire document

1	Exhibit 103 to Nardinelli Declaration	Entire document
2	Exhibit A to Nardinelli Declaration	Entire document
3	Exhibit B to Nardinelli Declaration	Entire document
4	Exhibit C to Nardinelli Declaration	Entire document
5	Exhibit D to Nardinelli Declaration	Entire document
6	Exhibit E to Nardinelli Declaration	Entire document
7	Exhibit F to Nardinelli Declaration	Entire document
8	Exhibit G to Nardinelli Declaration	Entire document
9	Exhibit H to Nardinelli Declaration	Entire document
10	Exhibit I to Nardinelli Declaration	Entire document
11	Exhibit J to Nardinelli Declaration	Entire document
12	Exhibit K to Nardinelli Declaration	Entire document
13	Exhibit L to Nardinelli Declaration	Entire document
14	Exhibit M to Nardinelli Declaration	Entire document
15	Exhibit N to Nardinelli Declaration	Entire document
16	Exhibit O to Nardinelli Declaration	Entire document
17	Exhibit P to Nardinelli Declaration	Entire document
18	Exhibit Q to Nardinelli Declaration	Entire document
19	Exhibit R to Nardinelli Declaration	Entire document
20	Exhibit S to Nardinelli Declaration	Entire document
21	Exhibit T to Nardinelli Declaration	Entire document
22	Exhibit U to Nardinelli Declaration	Entire document
23		Highlighted in green
24	Exhibit V to Nardinelli Declaration	Entire document
25		Highlighted in green
26	Exhibit W to Nardinelli Declaration	Entire document
27	Exhibit X to Nardinelli Declaration	Entire document
28	Exhibit Y to Nardinelli Declaration	Entire document
	Exhibit Z to Nardinelli Declaration	Entire document
	Exhibit AA to Nardinelli Declaration	Entire document

IT IS SO ORDERED.

Dated: _____, 2018

HON. WILLIAM ALSUP
United States District Court Judge